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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No.  
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF JOSHUA S  
LEVENBERG IN SUPPORT OF  
MEMORANDUM OF THE REORGANIZED  
DEBTORS REGARDING CLAIM OF  
CALIFORNIA DEPARTMENT OF WATER  
RESOURCES**

1 I, Joshua S Levenberg, pursuant to section 1746 of title 28 of the United States Code, hereby  
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,  
3 information, and belief:

4 1. I am employed as Chief Counsel, Gas and Electric Operations, in the Law Department of  
5 Pacific Gas and Electric Company (the “**Utility**”), a wholly-owned subsidiary of PG&E Corporation  
6 (“**PG&E Corp.**,” and, together with Utility, the “**Reorganized Debtors**” in the above-captioned chapter  
7 11 cases). I have been employed by the Utility since October 2007, and I have been employed in this  
8 role since 2017. In my current role, I am responsible for, among other things, representing the Utility in  
9 issues relating to its wholesale contracts and interconnection agreements with third parties. I also  
10 regularly consult with my colleagues elsewhere in the Utility’s Law Department on legal issues that  
11 cover a variety of other subject matter. I submit this Declaration in support of the *Memorandum of the*  
12 *Reorganized Debtors Regarding Claim of California Department of Water Resources*  
13 (“**Memorandum**”), filed contemporaneously herewith.

14 2. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon  
15 my personal knowledge, the knowledge of other personnel of the Reorganized Debtors working under  
16 and alongside me on this matter, including my colleagues elsewhere in the Utility’s Law Department,  
17 my discussions with PG&E’s professionals and various other advisors and counsel, and my review and  
18 my colleagues’ review of relevant documents and information. If called upon to testify, I would testify  
19 competently to the facts set forth in this Declaration. I am authorized to submit this declaration on behalf  
20 of the Reorganized Debtors.

21 3. On March 25, 2022, PG&E notified CDWR<sup>1</sup> in writing that it (i) would pay CDWR’s  
22 Claim No. 78104 in the principal amount of \$101,026.75 plus post-petition interest, as requested in the  
23 CDWR Motion, and (ii) would not contest that CDWR terminated its participation in the Cotenancy  
24 Agreement, with all rights reserved as to PG&E’s claim that CDWR has an outstanding obligation, not  
25 extinguished by its termination of the Agreement, to pay its pro rata share associated with the costs of  
26 removing the New Line.

27 \_\_\_\_\_  
28 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Memorandum.

1  
2 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
3 correct to the best of my knowledge, information, and belief. Executed this 25th day of March, 2022.

4 /s/ Joshua S Levenberg  
5 Joshua S Levenberg  
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